

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**CO-LEAD CLASS COUNSEL'S MOTION FOR AN ORDER
(1) PROHIBITING THE CAMBRIDGE ENTITIES FROM SEEKING REPAYMENT OF
ADVANCES TO CLASS MEMBERS RELATED TO ASSIGNMENT AGREEMENTS
THROUGH MEANS OTHER THAN THOSE IDENTIFIED IN THE COURT'S
DECEMBER 8, 2017 EXPLANATION AND ORDER [ECF NO. 9517],
AND FROM SPREADING MISINFORMATION CONCERNING THE EXPLANATION
AND ORDER; (2) REQUIRING CORRECTIVE DISCLOSURES;
(3) COMPELLING PRODUCTION BY THE CAMBRIDGE ENTITIES OF ALL
DOCUMENTS RELATING TO CLASS MEMBERS' RETIREMENT FUNDS BEING
HELD BY THEM AND ACCOUNTINGS AS TO SUCH FUNDS; AND
(4) DIRECTING THE CAMBRIDGE ENTITIES TO RETURN TO CLASS MEMBERS
THEIR RETIREMENT FUNDS HELD AS COLLATERAL RELATED TO
ASSIGNMENT AGREEMENTS,
ALONG WITH EARNINGS AND INTEREST THEREON**

Co-Lead Class Counsel (“Class Counsel”) respectfully moves the Court for an order (1) prohibiting the Cambridge Entities¹ from seeking repayment of advances to Class Members related to assignment agreements through means other than those identified in the Court’s December 8, 2017 Explanation and Order [ECF No. 9517] (“Explanation and Order”) and from spreading misinformation concerning the Explanation and Order; (2) requiring corrective disclosures; (3) compelling production by the Cambridge Entities of all documents relating to Class Members’ retirement funds being held by them and accountings as to such funds; and (4) directing the Cambridge Entities to return to Class Members their retirement funds held as collateral related to assignment agreements, along with earnings and interest thereon.

It has come to Class Counsel’s attention, as detailed in the Memorandum and Declaration submitted contemporaneously herewith, that Cambridge officers, including Addys Walker and Gail Milon, have made representations to Class Members that inaccurately describe the Court’s Explanation and Order and the ramifications thereof. Specifically, Cambridge is contending that, as a result of the Explanation and Order, any monies advanced to Class Members by Cambridge must be returned to it forthwith, irrespective of whether the Class Member has yet received a monetary award determination (or even filed a claim), and ignoring the rescission procedures set forth in the Court’s Explanation and Order. Furthermore, Cambridge also has represented the intention to engage in self-help by taking ownership of certain retirement funds (and/or interest on such retirement funds) as a means of effectuating the Class Members’ repayment of advanced

¹ The “Cambridge Entities” or “Cambridge” include the following: Cambridge Capital Group, LLC; Cambridge Capital Advisors LLC; Cambridge Capital Partners, LP; Cambridge Capital Group Equity Option Opportunities, LP; Cambridge Capital Holdings; Cambridge Capital Funding, Inc.; Your Case, LLC; and their present and former directors, officers, partners, employees, contractors, agents, consultants, affiliates, successors and assigns, including, but not limited to Addys Walker, Gail Milon, and Phillip T. (“Tim”) Howard.

monies. Finally, Cambridge has delayed in producing accountings of the retirement funds to Class Members, despite repeated requests for same.

Class Counsel fears that the Cambridge is in the process of liquidating Class Members' retirement accounts and converting them to its ownership. As such, Class Counsel wanted to bring this issue to the Court's attention as soon as possible.

Class Counsel respectfully requests that the Court issue an order consistent with the proposed order submitted herewith. In addition, given the exigencies involved, Class Counsel respectfully requests that the Court direct that the briefing on this Motion be expedited.

Dated: January 26, 2018

Respectfully submitted,

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Co-Lead Class Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing motion, along with the supporting documents, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter. Because neither counsel for the Cambridge Entities, Mr. Black, nor Mr. Howard has entered his appearance in this action, they are being served via email and Federal Express Overnight Mail at the below addresses:

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Dated: January 26, 2018

/s/ Christopher A. Seeger
Christopher A. Seeger